

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**OPERATING PERMIT 98OPRB202**  
to be issued to:

Rocky Mountain Natural Gas Company  
Piceance Creek Gas Plant and Compressor Station  
Rio Blanco County  
Source ID 1030037

Prepared by Geoffrey Drissel  
Revised December 16, 2004

I. Purpose:

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued February 1, 2000. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted January 30, 2004, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description:

This source is classified as a Natural Gas Production and Transmission facility as defined under Standard Industrial Classification 4922. Reciprocating engines are used to drive compressors, which compress natural gas for delivery to pipeline, and drive an electrical generator. Natural gas is processed by one of two natural gas liquid extraction plants, which remove natural gas liquids. Natural gas liquids product is collected and stored in pressure vessels and transported offsite via

trucks.

The facility is located in Rio Blanco County southwest of Meeker in an area designated as attainment for all criteria pollutants. This facility is within 100 km of Flattops Wilderness, a Federal Class I area and is within 50 miles of another state, Utah. This source is subject to 40 CFR Part 60, Subpart KKK Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. This source is considered to be a minor source in an attainment area (no criteria pollutant with a Potential to Emit > 250 Tons/Year) and is not considered major for purposes of Prevention of Significant Deterioration (PSD) regulations.

The facility is a 112(r) source and submitted their Risk Management Plan on June 20, 1999. The source indicated in their Title V application, that they consider themselves in compliance with all current applicable requirements except for permit limits that were in the process of modification at the time of issuance. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential Emissions (tpy)</u>	2003-2004
		<u>Actual Emissions (tpy)</u>
NOX	63.9	26.1
CO	88.3	34.8
VOC	33.5	14.9

Potential emissions are based on permit limits and potential emission calculations. Actual emissions are based on an inspection conducted by the Division in September of 2004. This source is not major for HAPs (no single HAP equal to or greater 10 tons per year, nor combination of HAPs equal to or greater than 25 tons per year).

### III. Discussion of Modifications Made:

#### Source Requested Modifications

The source requested that the following changes be made to the renewal Operating Permit:

- a revision to the semi-annual monitoring period and the annual compliance period
- a deletion of the reference to the catalyst manufacturer's recommendations for engines S002, S003 and S005
- a revision of the quarterly extended gas analysis requirement to annual for Unit S006, the ethylene glycol dehydrator
- the addition of several units to the insignificant activities list

#### Other Modifications

In addition to the changes requested by the source, the Division has included

changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to this Operating Permit. These changes are as follows:

#### Page following Cover Page

- The information regarding postmark dates following the monitoring and compliance report due dates was revised.

#### Section I - General Activities and Summary

- The language in Condition 1.3 was revised to reflect the most current version
- The language in Conditions 1.4 and 1.5 was changed to reflect the revised numbering of the General Conditions.
- The language in Condition 3.1 was revised to more appropriately address the PSD status of the source.
- Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

#### Section II - Specific Permit Terms

- The language regarding the presumption of compliance with the opacity standard if natural gas is used as fuel was updated to reflect the current version.
- The language regarding “credible” evidence was updated to reflect the current version.
- The GLYCalc version reference was updated to the current version.
- The reference to the sample KKK report in Appendix G was deleted.

#### Section III – Permit Shield

- The Permit Shield citation was revised.
- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements”.
- In addition, the following phrase “In addition, this shield does not protect

the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was added to the end of the introductory paragraph in Section 1.

- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence “Based upon the information available to the Division and supplied by the applicant.”

#### Section IV - General Conditions

- The General Conditions were updated to reflect the current version.

#### Appendices

- Appendix B and C were revised to reflect the current versions.
- Addresses in Appendix D were revised to reflect current information.
- The sample KKK report in Appendix G was removed